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FMC Corporation

Transmitted Via E-mail and Federal Express

January 31, 2012

Mr. Greg Weigel
On Scene Coordinator
Emergency Response Unit
Office of Environmental Cleanup
U. S. Environmental Protection Agency
Region 10
1435 North Orchard Street
Boise, Idaho 83706

Re: EPA Unilateral Administrative Order (UAO) for Removal Action
CERCLA Docket No. CERCLA 10-2010-0170
Task 1A – RCRA Pond Phosphine Assessment Study Report

Dear Mr. Weigel,

Pursuant to the requirements of the subject UAO, as modified in your letter of October 26, 2010, FMC submitted a draft RCRA Pond Phosphine Assessment Study Work Plan on November 1, 2010. FMC received draft comments from EPA on December 17, 2010 and subsequently provided Supplemental Information on the Phosphine Assessment Study Work Plan Design and Data Evaluations to Meet the RCRA Pond UAO Task 1a Objectives on February 3, 2011. Based on feedback from EPA, FMC submitted an Addendum to the Draft Assessment Study Work Plan on April 1, 2011 detailing the proposed adjustments to the scope and frequency of sampling as had been discussed with EPA to that date. FMC received comments on the Assessment Study Addendum during a conference call on June 8, 2011 and a letter from EPA on June 13, 2011 which indicated that EPA was providing approval of the work plan contingent upon FMC's submittal of a revised version of the RCRA Pond Phosphine Assessment Study Work Plan that incorporates the elements in the February and April 2010 submissions and includes soil gas monitoring at Pond 15S that is equivalent to the monitoring proposed in FMC's April 1, 2011 Addendum for Pond 18A. FMC submitted the RCRA Pond Phosphine Assessment Study Work Plan – Final on July 15, 2011 in accordance with EPA's June 13, 2011 letter.



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Enclosed please find the RCRA Pond Phosphine Assessment Report developed pursuant to the implementation of the Work Plan. The RCRA Pond Phosphine Assessment Report includes results of monitoring conducted pursuant to the RCRA Pond Phosphine Assessment Study Work Plan as well as results of all other monitoring conducted pursuant to other requirements of the RCRA Pond UAO and the Site Wide Phosphine Assessment Study conducted July-August 2011 pursuant to the CERCLA Administrative Order on Consent for a Supplemental Remedial Investigation and Feasibility Study. Monitoring results are evaluated in the report pursuant to the Work Plan and Interim Findings and Recommendations are presented based on that evaluation.

As we have agreed, while certain modifications to the monitoring are proposed in the recommendations for continued monitoring at Ponds 16S and 18A during 2012, pending further discussions with EPA and an agreement on modifications to monitoring, all monitoring described in the July 15, 2011 RCRA Pond Phosphine Assessment Study Work Plan will continue to be implemented while EPA reviews the report, excepting that perimeter pipe concentrations will be monitored monthly rather than bi-monthly at Pond Ponds 16S and 18A.

Pursuant to the provisions of section 39 of the UAO, FMC is providing five (5) hard copies of the enclosed deliverable to your attention in addition to this electronic submittal.

If you have any questions, please do not hesitate to contact me at 215/299-6700.

Sincerely,



Barbara Ritchie
Associate Director, Environment
FMC Corporation

cc: (via email only)

Andy Smith – EPA
David Reisman - EPA
Carla Fisher – EPA
Kira Lynch - EPA
Brian English - IDEQ
Kelly Wright - SBT
Susan Hanson - SBT